

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VICTORIANO TAVAREZ, Individually, and  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

EXTRACT LABS INC.,

Defendant.

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x

Civil Action No.: 1:21-cv-09916

MOTION TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF

x

I, William J. Downes, an attorney duly admitted to practice before this Court, respectfully request, pursuant to Local Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, that the Court grant me leave to withdraw as counsel for plaintiff in the above-entitled action.

I affirm the following under penalty of perjury:

1. I am an attorney admitted to practice in the United States District Court, Southern District of New York.

2. I am presently an associate of the law firm of Mizrahi Kroub LLP, attorneys for plaintiff in the above-entitled action ("Plaintiff").

3. Pursuant to Local Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I hereby respectfully seek an order from the Court granting my request to withdraw as counsel for Plaintiff in this action.

4. I respectfully request this order because, effective April 28, 2023, I will no longer be an associate attorney with Mizrahi Kroub LLP. However, at least one other attorney from

Mizrahi Kroub LLP has filed a Notice of Appearance for Plaintiff in this action and Plaintiff is duly represented by such counsel in this action.

5. I further respectfully request that any further notices regarding this action be terminated as to me and that I be removed from the Court's service list with respect to this action.

6. Plaintiff is aware of this motion and does not object to its filing. I do not assert a retaining or charging lien in this matter.

7. A copy of this motion will be served upon all counsel via ECF and upon Plaintiff.

DATED: April 27, 2023

**MIZRAHI KROUB LLP**

/s/ William J. Downes  
WILLIAM J. DOWNES

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